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**Before the
Federal Communications Commission
Washington, D.C. 20554**

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MAR 15 1996

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)

Closed Captioning and Video Description)
of Video Programming)

MM Docket No. 95-176

TO: The Commission

DOCKET FILE COPY ORIGINAL

**Comments of the
National Association of Broadcasters**

**NATIONAL ASSOCIATION OF
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March 15, 1996

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Summary

The Telecommunications Act, as the Commission recognizes, changes the focus of its inquiry concerning captioning and video description services. While the Commission is directed to adopt mandatory captioning rules, it is important for the FCC to keep in mind that captioning is not the only means by which hearing-impaired individuals can enjoy television programming.

NAB conducted a survey of commercial television stations to determine how much local programming is already captioned. The survey reveals that 70 percent of television stations provide captioning for some local programming. Of those stations, more than 80 percent caption local news programming. On average, those stations provide closed captioning for 19.5 hours of news programs each week. For stations that appear not to use electronic means of capturing captioning text, the average cost of captioning news programming is over \$1,000 per week.

Local stations should not be obliged to caption programs that they do not produce. The Commission should also provide exemptions for late night or other programming that attracts a very small audience. For live local programming, the rules should exempt programs that attract small audiences or programs which can be made accessible to hearing-impaired persons through non-captioning means, such as increased use of visual information. The Commission should not, however, adopt technical or quality standards for closed captioning.

NAB is not aware of any commercial station that now provides video descriptions. Video description services use the SAP channel; stations now use that channel for second language feeds and other purposes. Requiring video descriptions would impose higher burdens than captioning requirements as the insertion of narration essentially requires the preparation of a separate audio script. There are also program types — such as sports and other live programs — for which video descriptions may be difficult and not needed to ensure access by visually-impaired persons.

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TO: The Commission

**Comments of the
National Association of Broadcasters**

The National Association of Broadcasters ("NAB")¹ submits these comments in response to the Commission's *Notice of Inquiry* in this proceeding.² The Commission's *Order* of February 27, 1996 recognizes that the passage of the Telecommunications Act of 1996³ requires some adjustment in the way in which the Commission will take up issues relating to captioning and video description services. While the *Notice of Inquiry* apparently contemplated the issuance of proposed rules as the next stage of the regulatory process, the Telecommunications Act now instead requires the Commission first to issue a report on the level of closed captioning now available.

Further, many of the issues raised in the *Notice* no longer are open for the Commission's consideration. For example, it could have been argued that, given the steady increase in the

¹ NAB is a nonprofit incorporated association of radio and television stations and broadcast networks. NAB serves and represents the American broadcasting industry.

² On January 22, 1996, and February 27, 1996, the Commission issued orders extending the comment period in this proceeding.

³ Pub. L. 104-104, 110 Stat. 56 (1996).

availability of captioned programming, no rules requiring captioning were needed to ensure access by hearing-impaired individuals to television. Congress, however, has determined that mandatory captioning rules must be adopted and the focus of the Commission's consideration must instead be the form of such rules and the extent to which certain programs and programmers should be exempt. NAB's comments will address the issues that the Act directs the Commission to first consider and wait for further proceedings to discuss issues for which Congress contemplated a longer review, such as the detailed particulars of captioning rules.

In writing its report on the status of captioning, and in later developing captioning rules, the Commission should keep in mind two things. First, voluntary efforts by the broadcasting industry (with assistance from the Department of Education) resulted in the development of the closed captioning technology and the captioning of a very large amount of the television programming that is aired today. Indeed, Congress noted in 1992 the relatively large amount of over-the-air television programming that was provided with captions, as compared to programming aired on cable channels.⁴ There is no reason to believe that voluntary efforts to provide access to television for hearing-impaired individuals will not continue and, therefore, that a large measure of discretion should be left in any captioning rules to local broadcasters.

Second, the Commission should further keep in mind that all of the people who have hearing impairments do not require closed captioning to enjoy television. Some substantial portion of the hearing-impaired can gain access to television programming through other techniques, including merely adjusting the volume on their sets or using hearing aids, or through additional visual information. Thus, in weighing the relative burdens and benefits of requiring

⁴ See H.R. REP. NO. 628, 102d Cong., 2d Sess. 93 (1992).

captioning of certain programming, the Commission should not uncritically accept the proposition that, without captioning, all hearing-impaired persons could not have access to such programs.

Captioning by Local Stations

The Commission will receive comments from most of the national television networks and from suppliers of syndicated television programming that will indicate the level of captioning on such nationally-distributed programming. To develop information concerning the captioning of locally produced programming, and in particular the captioning of local news programming, NAB conducted a survey of all commercial television stations for which a facsimile telephone number was available. The results of the study are appended to these comments.⁵

As discussed in the report, almost two-thirds of the stations contacted responded to the survey. Of the stations responding, 70 percent provided closed captioning for some of their non-network programming. When asked about whether they provided captioning for local news programming, 81.5 percent of the stations which provide any local captioning indicated that they captioned their news. Those stations represent 57.1 percent of the total number of stations participating in the survey.

The report shows the distribution of these stations by market size. The markets with the highest percentage of stations providing captioned news programming are the mid-size markets (Nielsen DMAs 25-100). Although a smaller percentage of stations in the largest markets reported that they offered captioned news, that figure is not surprising because there are a larger number of small, independent stations in those markets who either do not have regular news

⁵ Fratrik, "The Television Industry's Provision of Closed Captioning Services in 1996," National Association of Broadcasters (March 15, 1996).

programming, or who would be unable to afford the additional financial burden of captioning their live programming.

The stations that provided captioning for their local news programs on average broadcast 22.3 hours of local news each week, or more than three hours every day. Of those programs, 19.5 hours on average are closed captioned each week. Thus, most of the news programs aired by the 80 percent of captioning stations who caption news is supplied with closed captions.

We then asked about stations' costs for providing captioning for local news. As the Commission is aware, there are two primary ways by which live news programs can be captioned.⁶ One method, often referred to as stenographic captioning, involves the use of a live stenographer to type the words in the newscast while they are being spoken. The captions appear on screen within seconds after they are spoken. The stenographer can be located at a station, or in a distant location connected to the station by telephone or other communications link. Although stenographic captioning provides captioning for all of the material on a newscast, it is relatively expensive.

The alternative method, known as electronic newsroom captioning, instead feeds the scripts of material prepared for news broadcasts from a TelePrompter or other station computer into a captioning encoder. Once the station has purchased the necessary captioning equipment and software, the operating costs for providing captioning are very low.⁷ Electronic newsroom

⁶ A summary of these techniques can be found on *Closed-Captioning Local News: Getting Started in Your Town*, an article on the World Wide Web page of the WGBH Captioning Center. These materials were referenced in note 5 of the *Notice of Inquiry*.

⁷ Depending on the particular capabilities that are needed, NAB estimates that the equipment and software needed for a station to provide electronic newsroom captioning (continued...)

captioning cannot, however, provide captions for ad-libbed material or other material that is not scripted. Thus, stations using this technology will provide captions, but there may be gaps in the captioned material.⁸

In order to better determine the costs for different approaches to captioning, the study reports two different average cost figures. For all stations that provide captioned news programming, the average weekly cost of providing captioning is \$514.16. That figure includes a number of stations who reported captioning at no weekly operating cost. Those stations would appear to be users of electronic newsroom captioning. Excluding the data from those stations, the average weekly cost for stations to provide captioning was \$1,007.12. This may represent stations who use stenographic captioning exclusively as well as stations that may use stenographic captioning to supplement electronic newsroom captioning. Some stations indeed reported weekly captioning costs as high as \$4,500.

NAB also sought to determine whether stations were able to find sponsors for their news captioning. Of the stations which provide captioned news, 67.9 percent reported that they had a sponsor for their closed captioning services.

The survey also asked stations to indicate how many hours of non-news local programming had been captioned in the last year. On average, stations captioned 100.05 hours of

⁷ (...continued)
would cost between \$2,500 and \$5,000.

⁸ Certain types of local news programming may be accessible to hearing-impaired individuals even without captioning. The most salient part of most weather forecasts, for example, are displayed visually as well as being described. This type of information is thus accessible to hearing-impaired individuals even if the audio portion of the weather forecast is not captioned.

sports or other non-news programming. Large market stations on average provided substantially more captioned sports and other non-news programs, reflecting their larger audience base.

Finally, although NAB is not aware of any commercial station that provides video description services at this point, the survey asked how many stations used their Second Audio Program (SAP) capability to provide a second language feed. While most stations did not, 4.7 percent of the responding stations indicated that they did provide second language feeds using the SAP channel.

The results of the NAB survey show that a large number of television stations are already providing closed captioned news and other local programming on a voluntary basis. Even though every station might not provide captioning for every newscast, it appears that in most television markets, hearing impaired individuals can gain access to local newscasts and other local programs.

The Impact of Digital Television

The *Notice* (§17) also seeks comment on the impact that the Commission's adoption of the Grand Alliance advanced television system would have on captions and specifically, the extent to which digital ATV could accommodate closed captioning. Work is currently underway in a Consumer Electronics Manufacturers Association (CEMA) committee to develop the necessary display characteristics and technical transport specifications for advanced television closed captioning (ATVCC). The development of ATVCC has been no easy task. Resolving issues such as defining new display features, finding a way to accommodate the existing captioning format in ATV and establishing how best to integrate the caption data in the Grand Alliance transport stream proved to be contentious and technically challenging. The technical specification for

ATVCC is largely completed and, while there are still a number of technical and implementation details that need to be resolved, considerable has been made.

Marketplace Incentives and Captioning

The *Notice* (§23) asks whether there are marketplace incentives favoring captioning of programming, and the February 27 *Order* supplements this request, seeking information on whether captioned programming receives higher ratings than non-captioned programs. As discussed above, a large number of the stations surveyed by NAB indicated that they had found sponsors for their news captioning efforts. Although that indicates some level of marketplace support for captioning, it is not clear whether that support extends to non-news programming or would be available if higher priced captioning technologies were mandated by the Commission. With respect to the Commission's ratings inquiry, NAB is not aware of any ratings data that compares captioned and non-captioned programming, nor of any studies suggesting that captioned programming receives materially higher ratings.⁹

Issues for the Commission to Consider in Developing Captioning Rules

The *Notice* (§§25-34) asks for comments on the contents of mandatory captioning rules. NAB of course reserves the right to comment on specific rules when the Commission proposes them, particularly in light of the evidence adduced in the Commission's report on captioning. In developing rules, the Commission's objective should be ensuring access by hearing-impaired persons to a broad range of video programming and information. That goal will have been

⁹ This inquiry is further complicated by the fact that television ratings services generally report watching in households, rather than by particular individuals. Many households may include both hearing-impaired and hearing individuals and ratings data would not record their viewing separately.

achieved even if some programs remain uncaptioned, either because they were produced before captioning technology became widespread and/or they reach only a small audience, or because the costs of providing captioning are too high given the nature of the program and the audience it reaches.

The House Report on the Telecommunications Act reflects Congress' understanding that it is "more efficient and economical to caption programming at the time of production and to distribute it with captions than to have each delivery system or local broadcaster caption the program." H.R. REP. NO. 204, 104th Cong., 1st Sess. 114 (1995). Thus, with respect to nationally distributed or syndicated programming, the Commission should place the initial captioning obligation upon the distributor or syndicator, rather than on local stations. Indeed, since many such programs are not fed to stations in advance of their airing, it would be impossible for stations to insert captioning. Thus, the rules should not obligate local television stations to insert captioning into programming that they do not produce.

As the House Report indicated, most network programming is already captioned, *id.* at 113, and the same may be true for most widely syndicated first-run programming and for most recent off-network syndicated programming. Requiring that those types of programs be captioned would not, for the most part, impose any undue burden on program suppliers.¹⁰ For certain programs with limited audiences, such as the overnight news feeds that several networks provide to affiliates, often using footage from local stations, the cost and burden of captioning hours of programming that may come from varying sources may be quite high, particularly in

¹⁰ Even in those situations, the Commission should provide a mechanism for program suppliers to obtain a waiver of the captioning requirements if captioning a particular program could be shown to be uniquely burdensome.

comparison to the very small audience for those programs. The Commission should exempt such programs from the captioning requirements.

Local stations should also not be obliged to caption advertising, infomercials, or other programming that they air but do not produce. As captioning technology becomes more widespread, captioning all programming will become routine, particularly if the cost of inserting captioning declines. A great deal of television advertising is also accessible to hearing-impaired persons even without captioning since pictures of products and other information is often visually displayed. The fact that graphic displays of information are often central to advertising also makes it inappropriate to require local stations to insert captioning themselves. Because the captions must be carefully placed on the screen to avoid blocking important parts of the visual message (which would also leave hearing-impaired viewers with only partial access), the time needed to prepare and insert captions is relatively high. Requiring advertisers to submit ads in sufficient time for stations to prepare and insert captioning would impose high costs on advertisers and stations.

With respect to programming that was produced prior to the effective date of the captioning rules, the Commission should provide a reasonable transition period to permit captioning to be added to programming in widespread syndication. The Commission should not, however, require that preexisting programming be captioned by stations if only a few stations air the program or if it is a program with a very small audience. Again, the burdens of requiring captioning for those types of programs would be high, while the impact on the ability of hearing-impaired viewers' ability to access information would be low. Were broadcasters or other program distributors required to suddenly provide captioning for all such programs, they might

instead choose to take programs off the air where the captioning could not be economically inserted. The House Report also indicates that the Commission should weigh the benefits of providing captioning “against the potential for hindering the production and distribution of the programming.” *Id.* at 115.

It appears that broadcasters are increasingly providing captioning for locally-produced programming. The Commission should encourage greater levels of captioning, but should allow stations a substantial transition period in the captioning rules. Stations in small markets or stations in large markets that attract only a small part of the audience in particular may be unable to afford widespread captioning immediately. The Commission should focus its attention first on news and other information programming and allow for exemptions or a longer transition period for other types of programs.

In addition to the factors like market size and the size of the audience for a particular program, the Commission may wish to differentiate between live and pre-taped programming. For live programming, captioning resources may be difficult to obtain at the time the program is aired. Pre-taped programming may permit stations to insert captioning before the program is aired at lower cost.

For local and regional sports programs, the Commission should consider permitting stations to ensure access by hearing-impaired viewers through other means than captioning. Much of the information on a sports telecast is visual and is the same that a spectator would receive at the game itself. Stations should be allowed to explore the use of other visual elements, such as on-screen “bugs” containing scores and other information, as alternatives to full closed captioning. Particularly for local sports events, where the cost of live captioning may be

prohibitive, these techniques can ensure that hearing-impaired persons have access to the game without imposing costs so high that stations will choose not to cover events at all.

The *Notice* (§32) also asks whether the Commission should adopt technical or quality standards for closed captioning. As discussed above, there are two different ways to caption live news programming — either using stenographers to write captions “on the fly,” or by feeding TelePrompter information into the captioning encoder. The cost of electronic newsroom captioning is less than stenographic captioning, and the cost of the latter appears to vary widely from provider to provider. Where a program includes very rapid speech, there are often editorial questions that arise concerning the best way to caption, *i.e.*, whether to include the full spoken text which may be difficult to read, or instead to summarize certain portions of the spoken dialogue to make the captioned text more understandable.

The Commission should not attempt to specify the means by which stations generate captions or create a captioning quality standard. Specifying technology would, among other things, discourage the development of new and more economical ways to provide captioning. To the extent that such rules would bar stations from using less expensive captioning technologies, they also would result in the cost of captioning becoming unduly burdensome for a greater amount of programming. Thus, imposition of technical standards may have the effect of reducing the amount of captioned programming.

The same is true with respect to any proposals that the Commission mandate quality or accuracy standards. Particularly with respect to captioning of live programming, such rules would deeply involve the Commission in ongoing editorial concerns. Further, there is no reason why the Commission should adopt such rules; broadcasters have a strong interest in ensuring that they

provide a quality product. The Commission should rely on broadcasters' own incentives to provide quality captioning, particularly in the absence of any evidence that broadcasters are regularly providing captioning of inferior quality. Further, particularly with live captioning, it is almost impossible to guarantee absolute accuracy. Rules that impose unreasonably high accuracy standards would require broadcasters to adopt the most expensive captioning systems and, therefore, would also increase the number of programs that could not be economically captioned.

Video Description Services

The Commission also asks for comments and information concerning the offering of video description services. Under the Telecommunications Act, the Commission is not directed to adopt video description rules, as it must do for closed captioning, but instead only to report to Congress with recommendations.

NAB is not aware of any commercial television station that now provides descriptive video services. As the Commission recognizes (*Notice* ¶16), transmission of the video description signal uses the Second Audio Program (SAP) channel. Thus, to the extent that stations use their SAP channels for other purposes, they could not also be used to provide video description services. The NAB survey found that 4.7 percent of stations reported using the SAP channel to provide a second language feed for at least some programming. The stations that reported providing an SAP feed were clustered in large urban areas where there are larger non-English speaking populations. NAB estimates that the stations providing some foreign language SAP feeds reach roughly 28 percent of all television households.

In addition, a 1994 NAB survey of television stations revealed that, of stations that have the capability to transmit the SAP channel, approximately 23 percent used it consistently for some

purpose. For example, some of the uses other than descriptive video and second language feeds were: delivery of commercials to local radio stations, National Weather Service feeds, traffic reports, and agriculture and farm reports.¹¹ Thus, unlike captioning, providing descriptive video services under the current television standard would mean that stations could not provide other services that they may now offer viewers.

There are a number of other factors that the Commission should consider in evaluating efforts to expand video description services. First, unlike closed captioning, which involves transcribing the existing program, providing a description of the video portion of a television program requires the creation of a separate script. Further, that script must be worked into gaps in the audio portion of the program or an entirely separate audio track must be created. The video description would also constitute a separate “work” for copyright purposes, possibly requiring additional clearances and other revisions to contractual obligations. Video descriptions also require that producers hire narrators and may require a separate director and other technical staff. Thus, providing video descriptions of even pre-taped programming would require substantially greater efforts than providing captioning of the same program.

There may be many categories of programming, such as talk shows or some situation comedies, where the dialogue is almost continuous, and there are insufficient places within the program in which to insert narrative descriptions. Of course, for live programming, providing narrations would be particularly difficult and burdensome to broadcasters. Moreover, it may not be necessary to provide a narration for many live events to ensure that visually-impaired

¹¹ A number of stations also reported that they carried another feed of their main audio channel on the SAP channel to avoid consumer confusion if the SAP channel were inadvertently selected.

individuals have access to coverage since these events will often be covered by radio stations whose programming is fully accessible to visually-impaired persons.

In making recommendations to Congress, the Commission should also take into consideration the fact that not all stations are now equipped to provide a stereo signal and thus could not carry material on the SAP channel. Production facilities and network distribution channels may also not have been built to accommodate additional audio channels and, thus, requiring stations to include video descriptions may impose very substantial economic burdens on stations and distributors and producers of video programming.

The Commission asked (*Notice* ¶17) about the impact of the transition to digital television on the ability of stations to provide video description services. The Grand Alliance standard does have a provision for a so called VI (visually Impaired) service which is intended to carry a narrative description of the visual content of a program. The VI service could be a single audio channel or it could be a complete program mix coded using up to 5.1 audio channels.¹²

Conclusion

In preparing the report on closed captioning required by the Telecommunications Act, the Commission should conclude that voluntary efforts by the industry have resulted in the widespread availability of closed captioning of broadcast programming. In addition to nationally distributed programming, a very large proportion of stations now offer closed captioned news and other local programming. As the Commission moves towards mandatory captioning rules, it


¹² See *Guide to the Use of the ATSC Digital Television Standard* Section 6.6.4.3. In order to take advantage of this provision, detailed technical criteria would need to be established that would describe how the information would be coded and decoded. NAB is not aware of any such specific development efforts by any organization at this time.

should make sure that captioning obligations imposed on local stations are not so burdensome as to discourage them from offering different types of local programming.

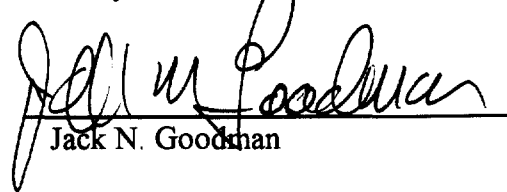
Respectfully submitted,

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BROADCASTERS

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A handwritten signature in dark ink, appearing to read "H. Baumann", written over a horizontal line.

Henry L. Baumann

A handwritten signature in dark ink, appearing to read "Jack N. Goodman", written over a horizontal line.

Jack N. Goodman

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March 15, 1996

THE TELEVISION INDUSTRY'S PROVISION OF CLOSED CAPTIONING SERVICES IN 1996

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March 15, 1996

THE TELEVISION INDUSTRY'S PROVISION OF CLOSED CAPTIONING SERVICES IN 1996

Introduction

As part of the Telecommunications Act of 1996, the Federal Communications Commission (FCC) is required to report to Congress about the present provision of closed captioning services by television broadcasters and to promulgate rules for further implementation of this service. Many broadcasters are already providing this service on some of their programming, especially affiliates of the major television networks who are providing captioning services for their airing of their network programming as for other programming.

In order to evaluate the present level of captioning, particularly of non-network programming, we conducted a fax survey of all commercial television stations with known fax numbers asking about whether they provided closed captioning services for any of their non-network programming and specifically whether their local news were captioned. Nearly three quarters of the stations responding reported providing some captioning services, with four-fifths of those stations captioning their local news. Some information about the costs of providing closed captioning service was also obtained.

Methodology

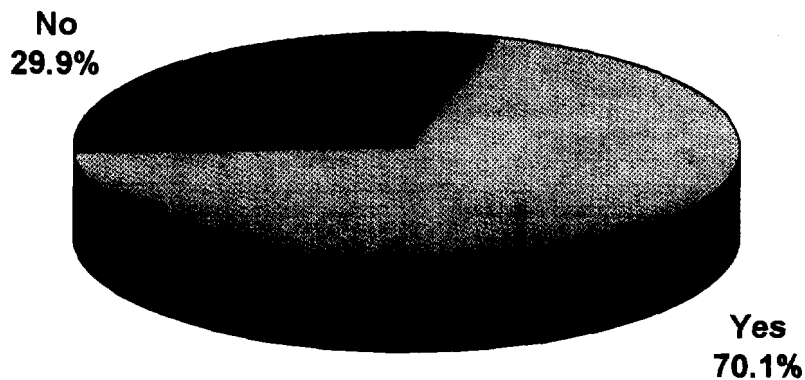
We faxed a one-page survey (included in Appendix A) to all commercial (non-satellite) television stations with known fax number (979 commercial television stations). Two attempts were made for both the first and second requests for information. Of those we attempted to contact, 935 stations received at least one of the information requests. We received usable responses from 603 stations, a 64.5% response rate.

Results

Overall Provision of Captioning on Non-Network Programming

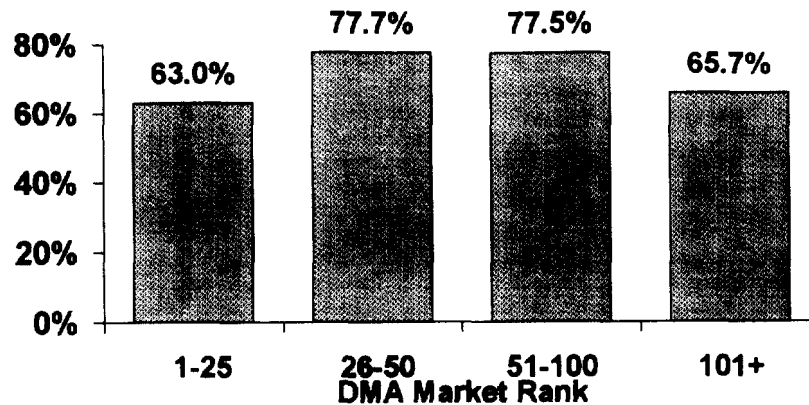
Figure 1 shows the distribution of stations which are providing any closed captioning for their local or syndicated (non-network) programming. Seven out of ten responding stations reported that they were captioning some of this programming.

Figure 1
Percentage of Stations Providing Closed Captioning
for Local or Syndicated Programming



There is some difference by market size in the percentage of responding stations who are captioning some of their local or syndicated programming. The highest percentage of stations captioning are those in the mid-sized markets (Nielsen DMA market ranks 26-50 and 51-100), where over three-quarters of responding stations in those markets reported they provide this service. Figure 2 shows the percentage reporting that they provide this service for the four market size groupings.

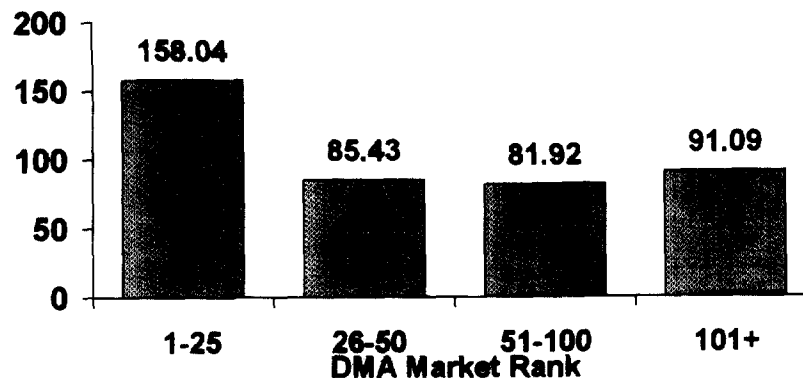
Figure 2
Percentage of Stations Providing Closed Captioning
for Local or Syndicated Programming
by Market Size



While many of these stations were providing captioning on their local news as discussed below, many stations were also providing captioning with other programming. The average station provided closed captioning services for 100 hours (100.05 hours) in the last year of locally produced sports and other non-news programming.

There is a difference in the amount of programming provided across the different market sizes, with the stations in the largest markets airing noticeably more non-news local and syndicated programming with closed captioning. Figure 3 shows the average number of hours provided in the last year by the stations providing these services in the four market size groupings.

Figure 3
Average Number of Hours Of Locally Produced
Sports and Non-News Programming Provided
With Closed Captioning by Market Size



Provision of Captioning Services on Local News Programming

Of those stations which were providing some non-network programming with closed captioning, more than eight out of ten (81.5%) were providing closed captioning services for some or all of their local news programming. These stations were providing 22.3 hours of local news per week, of which 19.5 hours (87.4% of the total news hours) were local news with closed captioning services being provided.

Many of the responding stations offered the comment that their local news closed captioning was accomplished through programs that were directly connected to their computer systems. In those systems, what is inputted into the TelePrompter program is directly fed to the closed captioning system. Consequently, when we asked for the weekly operating costs for providing closed captioning for their news many stations (90 responding stations) reported that they had zero operating costs. This does not mean, however, that the total costs of providing these services is zero, for the capital costs of the closed captioning equipment, as well as the accompanying software to transfer the script to the encoder is not zero.

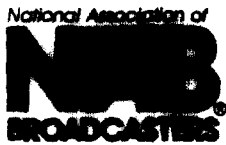
For those stations which have positive operating costs (i.e., did not report zero), the average weekly operating costs is \$1,007.12. Several of the responding stations, which may be providing closed captioning services using other technologies, reported weekly operating costs of over \$4,500.

Finally, over two-thirds (67.1%) of the stations which are providing closed captioning services in their local news have a sponsor for these services.

Other Services Provided

Another related issue concerns the possibility of stations providing video description services. This service would be provided on the SAP channel, where several stations serving diverse ethnic backgrounds are already providing a second language feeds. While only 4.7% of the stations reported using the SAP channel for a second language feed, many of these stations are in large markets where there are significant non-English speaking populations.

APPENDIX A
FAX QUESTIONNAIRE



CLOSED CAPTIONING SURVEY

FEBRUARY 1996

We need your help! Please respond by Wednesday, February 14, 1996.

The new Telecommunications Act requires the FCC to report to Congress about closed captioning on television stations, and then adopt captioning rules. The FCC has already issued a Notice of Inquiry about captioning and NAB is collecting data to document station activity in providing captioning services. To accomplish this, we need some summary data about your station's closed captioning efforts. **Your individual station data will be kept confidential and NAB plans to submit a summary of these data to the FCC in its upcoming comments.**

Please complete these few questions and fax your responses back to us at: 202-775-3526 or 202-775-2980, no later than Wednesday, February 14, 1996. If you would like to discuss the survey, please contact: Mark Fratrik, VP/Economist, NAB Research and Planning, 202-429-5377. Thank you.

Calls: _____ Person Completing Form: _____ Phone: _____

1. Is your station providing any closed captioning for your local or syndicated (i.e., non-network) programming?
_____ Yes _____ No (please go to question 8)
2. Do you provide closed captioning for your local news programming?
_____ Yes _____ No (please go to question 7)
3. How many weekly hours of local news do you provide?
_____ hours
4. How many weekly hours of local news are closed captioned?
_____ hours
5. What are the operating cost, per week, for providing closed captioning for the local news?
\$ _____
6. Do you have a sponsor for these closed captioning services?
_____ Yes _____ No
7. In the last year, for approximately how many hours of locally produced sports and other non-news programming did your station provide closed captioning?
_____ hours
8. Do you provide any second language feeds on your SAP channel?
_____ Yes _____ No
9. Does your station generate revenue from data sent via your station's Vertical Blanking Interval (VBI)?
_____ Yes _____ No
10. Does your station have a World Wide Web Site?
_____ Yes _____ No

**Please fax your responses by Wednesday, February 14th to:
NAB Research and Planning
202-775-3526 or 202-775-2980**